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January 10, 2019

**BY FEDERAL EXPRESS**

Lydia A. Wright, Esq.  
Burns Charest, LLP  
365 Canal Street, Suite 1170  
New Orleans, LA 70130

Re: Subpoena in Novoa v. The GEO Group, Inc.  
Civil Action No. 5:17-cv-02514-JGB-SHK  
U.S.D.C., C.D. California

Dear Ms. Wright:

As you are aware from our prior correspondence, this firm represents the American Correctional Association (“ACA”) in connection with the subpoena issued by you to ACA (“the Subpoena”) in the above-referenced proceeding (“the Proceeding”).

ACA objects to Instructions 4 and 5 of the Subpoena on the ground that (a) ACA does not, absent expenditure of significant funds, have the capacity to produce electronically stored information in the manner requested; (b) ACA has very few emails and no text messages responsive to the Subpoena; and (c) responsive documents in ACA’s possession, custody or control do not relate to the substance of the claims asserted by the plaintiff in the Proceeding. Without waiving this objection, ACA agrees to consider producing, in the manner required by these Instructions, any records which you specifically identify to us following your review of the documents enclosed herewith.

ACA is producing copies of all documents in its possession, custody or control which are responsive to the seven categories of documents requested in the Subpoena. ACA has not identified any privileged documents responsive to the Subpoena; however, if ACA subsequently identifies any such responsive, but privileged, documents, we will advise you accordingly and assert the privilege. Documents are being produced in the manner in which they have been kept in the ordinary course of business by ACA.

Enclosed herewith are documents numbered ACA 001 through ACA 139, which documents are responsive to Requests 1 and/or 2 of the Subpoena and relate to ACA’s accreditation and reaccreditation of the Adelanto Detention Facility (“the Facility”) in 2014 and 2017, respectively. The addresses, telephone numbers and email addresses of

the auditors who inspected the Facility in 2013 and 2016 have been redacted on pages numbered ACA 001, ACA 012 and ACA 091 to protect those individuals' privacy. Documents numbered ACA 140 through ACA 173 are annual reports submitted by the Facility to ACA. Documents numbered ACA 174 through ACA 187 are from ACA's contract file.

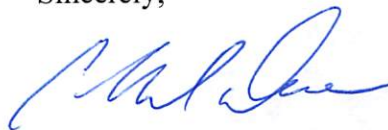
ACA is not in possession of documents responsive to Requests 3, 4 or 5 of the Subpoena.

With respect to Request 6 of the Subpoena, which seeks "public-facing documents" referencing The Geo Group ("GEO"), the Department of Homeland Security ("DHS") or the Facility, ACA is producing, as documents numbered ACA 188 and ACA 189, a magazine article tangentially referencing DHS and a newsletter reference to the Facility as being among those accredited by ACA. ACA has been unable to find any mentions of GEO, DHS or the Facility in any of its annual reports or marketing materials. As a charitable educational organization, ACA does not have "prospectuses" or "investor relations documents." Several ACA publications contain advertisements, and GEO is one of many advertisers in those publications; however, because we did not interpret Request 6 to include GEO advertisements, ACA has not searched for and is not producing any such advertisements.

With respect to Request 7 of the Subpoena, ACA does not have any "organizational charts reflecting ACA resources expended at" the Facility. Enclosed herewith are documents numbered ACA 190 and ACA 191, which set forth the fees paid to ACA in connection with ACA's inspection and accreditation of the Facility and the certification of two supervisors at the Facility in 2018. Portions of credit card numbers have been redacted from document ACA 191.

Finally, attached as documents numbered ACA 192 through ACA 203 are a series of emails and two attachments relating to the administration of ACA's Corrections Certification Examination at the Adelanto facility, which documents are responsive to Request 2 of the Subpoena.

Sincerely,



C. Michael Deese

Enclosures